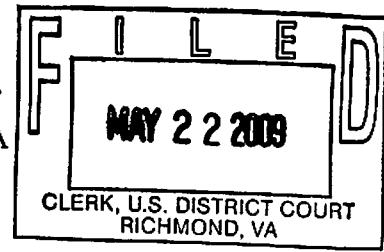


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division



PAMELA G. CAPPETTA )

Plaintiff, )

v. )

)  
GC SERVICES, LP )

Defendant. )

)  
Civil Action  
No. 3:08cv288  
)

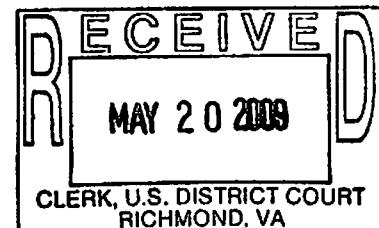
**CONSENT ORDER REGARDING DEFENDANT'S MOTION FOR A  
PROTECTIVE ORDER**

In resolution of Defendant's Motion for a Protective Order regarding the electronic documents produced from the Terri Paurich laptop and associated backup disks, IT IS HEREBY STIPULATED by and between Plaintiff Pamela G. Cappetta and Defendant GC Services, LP through their respective attorneys of record, as follows:

1) This dispute came before the Court regarding the Defendant's designation of the entirety of Terri Paurich's laptop and backup disks as either Confidential or Confidential-Attorney's Eyes Only and Plaintiff's objection to that blanket designation as improper and not sufficiently definite.

2) In the interest of achieving a resolution that does not necessitate further involvement by this Court, the parties hereby stipulate that the documents produced on the laptop or any backup disk shall be designated as "Confidential" as of the entry of this Order.

3) No later than May 22, 2009, Plaintiff will produce for the Defendant a list of documents contained therein that Plaintiff contends in good faith are not properly designated as either Confidential or Confidential-AEO.



- 4) No later than May 22, 2009, Defendant shall produce for the Plaintiff a list of documents that it contends in good faith require the heightened Confidential-AEO protection.
- 5) To the extent that any disagreements remain, the parties shall thereafter meet and confer to discuss each of the specific documents that remain in dispute and shall exhaust every possible avenue of resolving such dispute without the filing of further motions.
- 6) For purposes of determining the procedure for the potential filing of any document so designated, this Order does not modify Local Rule 5(C), Local Rule 7(C), Fed. R. Civ. P. 5.2, or this Court's protective order of October 27, 2008 with regard to the same.

**IT IS SO ORDERED.**

Dated: May 22, 2009

/s/

James R. Spencer  
Chief United States District Judge

Dated:

Matthew J. Erausquin

Matthew J. Erausquin, Esq.  
CONSUMER LITIGATION ASSOCIATES, P.C.  
3615-H Chain Bridge Road  
Fairfax, Virginia 22030  
*Counsel for the Plaintiff*

Dated:

  
\_\_\_\_\_  
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Richmond, VA 23219  
*Counsel for Defendant GC Services, LP*